



August 15, 2005

Arthur Neal, Director, Program Administration  
National Organic Program  
USDA-AMS—TMP-NOP  
1400 Independence Ave., SW., Room 4008  
So. Ag Stop 0268  
Washington, DC 20250

via e-mail: [National.List@usda.gov](mailto:National.List@usda.gov)

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

nSpired Natural Foods thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

Calcium hydroxide, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specific ingredients or food group(s)).” This substance is a processing aid in the production of organic evaporated cane juice.

nSpired Natural Foods currently uses organic evaporated cane juice to produce Maranatha® brand Honey Sweetened Almond Butter and Honey Sweetened Peanut Spread, as well as Ah!Laska® brand Organic Chocolate Syrup. Evaporated cane juice of adequate quality cannot be produced without the use of calcium hydroxide, since there is no suitable alternative processing aid. Being a basic ingredient and a versatile sweetener with unique (flavor-neutral, handling, etc) characteristics, organic evaporated cane juice (made with calcium hydroxide) is essential in our formulation without which we would not be able to produce our honey sweetened nut butters or organic chocolate syrup.

In addition, please note that calcium hydroxide is permitted for use in the production of organic sugar under European Union regulation number 2092/91. The removal of calcium hydroxide from the National List and the resulting incompatibility between organic standards would all but eliminate the export of “organic”, sugar-containing products to the EU, the largest market for US produced multi-ingredient products.

Sincerely,

Robin Robinson  
nSpired Natural Foods  
Vice President, Marketing



LORIVA® MARANATHA



SPEAKEASY

Sunspire® TropicalSource®

710 Jefferson Avenue Ashland, OR 97520 541-488-2747 Fax 541-488-3369  
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nSpired Natural Foods thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

Carrageenan, as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is used as a natural thickening or emulsifying agent.

nSpired Natural Foods currently uses carrageenan to produce Ah!Laska® brand Organic Cocoa Non-Dairy Chocolate Mix and Organic Cocoa Chocolatey Chocolate Mix. Carrageenan is essential as a key ingredient in our formulation without which we would not be able to produce these organic products.

In addition, please note that carrageenan is permitted for use in the production of organic sugar under European Union regulation number 2092/91. The removal of carrageenan from the National List and the resulting incompatibility between organic standards would all but eliminate the export of "organic" carrageenan-containing products to the EU, the largest market for US produced multi-ingredient products.

At this time there is no suitable organic alternative to the carrageenan that is currently being used. Therefore, it is essential that carrageenan be kept on the National List Section § 205.606.

Sincerely,

Stacey Kelly  
nSpired Natural Foods  
Director of Consumer Marketing

Cc: Robin Robinson, VP Marketing



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nSpired Natural Foods thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

Lecithin (unbleached), as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))." This substance is used as an emulsifier in the production of organic chocolate.

nSpired Natural Foods currently uses organic chocolate to produce Sunspire® brand Organic Chocolate Chips, Organic Dark Chocolate Almonds, Organic Dark Chocolate Raisins, Organic Dark Chocolate Coffee Beans, Organic Dark Chocolate Blueberries and Organic Dark Chocolate Cranberries. Organic chocolate made with lecithin (unbleached) is essential as a key ingredient in our formulation without which we would not be able to produce our various organic products.

Although we are aware that organic lecithin (unbleached) has been produced, after running tests the producer of our organic chocolate has found the quality and characteristics of that organic lecithin is not suitable. At this time there is no suitable organic alternative to the natural, non-GM lecithin (unbleached) that is currently being used. Therefore, it is essential that lecithin (unbleached) be kept on the National List Section § 205.606.

Sincerely,

Robin Robinson  
nSpired Natural Foods  
Vice President, Marketing



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